

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SURYANARAYANAN RANGANATHAN,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

V.

WILDHORSE RESOURCE DEVELOPMENT CORPORATION, JAY C. GRAHAM, ANTHONY BAHR, BRIAN A. BERNASEK, JONATHAN M. CLARKSON, SCOTT A. GIESELMAN, DAVID W. HAYES, STEPHANIE C. HILDEBRANDT, GRANT E. SIMS, MARTIN W. SUMNER, TONY R. WEBER, COLEBURN INC., and CHESAPEAKE ENERGY CORPORATION,

Defendants,

Civil Action No. 1:19-cv-00015-  
CFC

# CLASS ACTION COMPLAINT FOR VIOLATIONS OF SECTIONS 14(a) AND 20(a) OF THE SECURITIES EXCHANGE ACT OF 1934

## JURY TRIAL DEMAND

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), plaintiff Suryanarayanan Ranganathan (“Plaintiff”) hereby voluntarily dismisses the above-captioned action (the “Action”) without prejudice. Defendants have filed neither an answer nor a motion for summary judgment in the Action, and no class has been certified.

Dated: February 11, 2019

**RIGRODSKY & LONG, P.A.**

By: /s/ *Brian D. Long*

Brian D. Long (#4347)  
Gina M. Serra (#5387)  
300 Delaware Avenue, Suite 1220  
Wilmington, DE 19801  
Telephone: (302) 295-5310  
Facsimile: (302) 654-7530  
Email: bdl@rl-legal.com  
Email: gms@rl-legal.com

**OF COUNSEL:**

**ROWLEY LAW PLLC**

Shane T. Rowley

Danielle Rowland Lindahl

50 Main Street, Suite 1000

White Plains, NY 10606

Tel: (914) 400-1920

Fax: (914) 301-3514

*Attorneys for Plaintiff*